

JAP:HLJ

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-10-1387

- - - - -X

UNITED STATES OF AMERICA

- against -

SOU HAN WONG,
also known as "Fat Henry,"

Defendants.

COMPLAINT AND AFFIDAVIT
IN SUPPORT OF APPLICATION
FOR ARREST WARRANT

(T. 18, U.S.C.
§ 922(g)(1))

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EASTERN DISTRICT OF NEW YORK, SS:

ISMAEL HERNANDEZ, being duly sworn, deposes and says that he is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"), duly appointed according to law and acting as such.

Upon information and belief, on or about November 16, 2010, within the Eastern District of New York, the defendant SOU HAN WONG, also known as "Fat Henry," having been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly and intentionally possess in and affecting commerce ammunition, to wit: 40 rounds of Remington .44 magnum High Velocity Hollow Point ammunition; 200 rounds of Remington .22 caliber High Velocity ammunition; 100 rounds of CC1 .22 caliber mini magnum Long Rifle High Velocity ammunition; 50 rounds of .22 caliber Magnum Long Rifle ammunition; 100 rounds of

Winchester .22 caliber Magnum Hollow Point ammunition; 24 rounds of PMC .45 caliber ammunition; 14 rounds of PMC 9 millimeter hollow point ammunition; and 43 rounds of PMC 9 millimeter ammunition.

(Title 18, United States Code, Section 922(g)(1)).

The source of your deponent's information and the grounds for his belief are as follows¹:

1. I have been a Special Agent with ATF for approximately nine and one-half years. My information in this case comes from reviews of records of the New York City Police Department ("NYPD"), conversations with NYPD officers, records from the United States District Court for the Southern District of New York, records from the United States Probation Department ("USP") for the Eastern District of New York, conversations with USP Officers ("USPO") and other official records of government agencies.

2. I have reviewed criminal history records for the defendant SOU HAN WONG, also known as "Fat Henry," which reveal that the defendant was convicted on February 13, 1997 for

^{1/} Because this affidavit is being submitted for the limited purpose of establishing probable cause to arrest SOU HAN WONG, also known as "Fat Henry," as described in greater detail below, I have not set forth every fact learned during the course of this investigation.

Conspiracy to Commit Murder, in violation of 18 U.S.C. § 1962(c) in the United States District Court for the Southern District of New York, and was sentenced to 200 months imprisonment and three years of supervised release. The defendant SOU HAN WONG, also known as "Fat Henry," was released from custody on October 13, 2010 and ultimately assigned to USPO Lawrence Goldman in the Eastern District of New York.

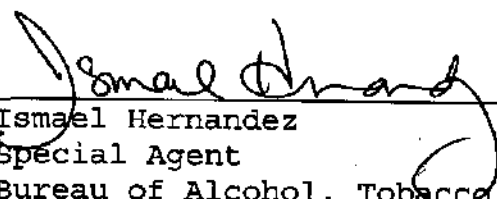
3. On or about November 16, 2010, USPO Lawrence Goldman and USPO Eric Scherdel conducted a home visit with the defendant SOU HAN WONG, also known as "Fat Henry," at his residence in Brooklyn, New York as part of the defendant's supervised release. The defendant told the USPOs that he resided alone. While USPO Goldman was in the living room he observed a .22 caliber hollow point round in an ash tray. In addition, USPO Officer Scherdel observed seven 9 millimeter PMC hollow point rounds displayed in an entertainment center. Supervisory USPO Joe Franco then arrived at the defendant's residence.

4. The USPOs questioned the defendant about the presence of any firearms or other ammunition at his residence. The defendant SOU HAN WONG, also known as "Fat Henry," refused to answer any questions about possessing a firearm in the residence but informed the USPOs that he possessed additional ammunition and directed the USPOs to the entertainment center,

where USPO Goldman recovered a white plastic bag with a FedEx box inside. Inside the FedEx box USPO recovered the following additional ammunition: 40 rounds of Remington .44 magnum High Velocity Hollow Point ammunition; 200 rounds of Remington .22 caliber High Velocity ammunition; 100 rounds of CC1 .22 caliber mini magnum Long Rifle High Velocity ammunition; 49 rounds of .22 caliber Magnum Long Rifle ammunition; 100 rounds of Winchester .22 caliber Magnum Hollow Point ammunition; 24 rounds of PMC .45 caliber ammunition; 7 rounds of PMC 9 millimeter hollow point ammunition; and 43 rounds of PMC 9 millimeter ammunition. In addition, USPOs recovered a holster and a cylinder for a .22 caliber revolver from the FedEx box. The defendant SOU HAN WONG, also known as "Fat Henry," then informed USPO that he possessed ballistic vests inside a Macy's bag in his bedroom closet. USPO Scherdel then recovered 2 ballistic vests from a Macy's bag that was located in said bedroom closet.

5. Based on my training and experience as an ATF interstate nexus expert I know that all of the above-mentioned ammunition was manufactured outside the State of New York.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued for the defendant SOU HAN WONG, also known as "Fat Henry," so that he may be dealt with according to law.



Ismael Hernandez
Special Agent
Bureau of Alcohol, Tobacco,
Firearms, and Explosives

Sworn to before me this
22nd day of November, 2010

UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK